

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MARIETTA BRISCOE, on behalf of herself
and others similarly situated,

Plaintiff,

v.

DEUTSCHE BANK NATIONAL TRUST
COMPANY; DEUTSCHE BANK
NATIONAL TRUST COMPANY, as trustee
FOR NEW CENTURY NCHET 2005-C,
N.A.; CHASE HOME FINANCE, LLC,

Defendants.

Case No. 08 C 1279

Judge James B. Zagel
Mag. Judge Michael T. Mason

**AGREED MOTION FOR EXTENSION OF TIME TO ANSWER
OR OTHERWISE RESPOND TO AMENDED COMPLAINT**

With Plaintiff's agreement, Defendants Deutsche Bank National Trust Company and Deutsche Bank National Trust Company, as trustee for New Century NCHET 2005-C, N.A. (collectively, for purposes of this Agreed Motion only, "DBNTC"), hereby move this Court for entry of an order extending their time to answer or otherwise respond to the Amended Complaint until August 7, 2008. In support of this agreed motion, DBNTC states as follows:

1. DBNTC remains in the process of completing its factual investigation necessary to answer or otherwise respond to the Amended Complaint filed on June 30, 2008. Counsel for DBNTC and Plaintiff's counsel, Al Hofeld, Jr., have communicated on multiple occasions since June 30, 2008 regarding the factual allegations in the Amended Complaint and the exhibits thereto. These discussions between counsel remain ongoing and both parties expect to communicate further regarding Plaintiff's amended allegations during the upcoming weeks.

2. Counsel for DBNTC spoke with Plaintiff's counsel, Al Hofeld, Jr., on July 15, 2008, at which time Mr. Hofeld, on behalf of his client, agreed to extend DBNTC's time to answer or otherwise respond to the Amended Complaint up to and including August 7, 2008.

WHEREFORE, DBNTC, with Plaintiff's agreement, respectfully requests that the Court enter an Order extending DBNTC's time to answer or otherwise respond to the Complaint until August 7, 2008.

Respectfully submitted,

**DEUTSCHE BANK NATIONAL TRUST
COMPANY and DEUTSCHE BANK
NATIONAL TRUST COMPANY, as trustee**

By: /s/ Kevin B. Dreher

One of Their Attorneys

Kevin B. Dreher
Morgan, Lewis & Bockius LLP
77 W. Wacker Drive, 5th Floor
Chicago, IL 60601
Telephone: 312-324-1000
Facsimile: 312-324-1001

CERTIFICATE OF SERVICE

I, Kevin B. Dreher, hereby certify that on July 15, 2008, I electronically filed the attached AGREED MOTION FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE RESPOND TO AMENDED COMPLAINT with the Clerk of the Court using the Court's Electronic Case Filing System, which will send notification of such filing to the following:

Al Hofeld, Jr.
Law Offices of Al Hofeld, Jr., LLC
208 S. LaSalle Street, Suite #1650
Chicago, IL 60604
(312) 345-1006
Fax: 312-346-3242
al@alhofeldlaw.com
Attorney for Plaintiff

Robert Jerald Emanuel
Burke, Warren, MacKay & Serritella, P.C.
330 North Wabash Avenue
22nd Floor
Chicago, IL 60611-3607
(312) 840-7000
remanuel@burkelaw.com

Susan J. Miller
Burke, Warren, MacKay & Serritella, P.C.
330 North Wabash Avenue
22nd Floor
Chicago, IL 60611
(312) 840-7000
smiller@burkelaw.com
Attorneys for Defendant Chase Home Finance, LLC

/s/ Kevin B. Dreher
Kevin B. Dreher